

# EXHIBIT 68-22



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10                  *Attorneys for Plaintiff*

11                  UNITED STATES DISTRICT COURT

12                  DISTRICT OF ARIZONA

13                  Valentino Dimitrov, individually, and on  
14                  behalf of all others similarly situated;

15                  Case No.: 2:23-CV-00226-PHX-DJH

16                  Plaintiff,

17                  vs.

18                  Stavatti Aerospace, Ltd, a Minnesota  
19                  corporation; Stavatti Aerospace, Ltd, a  
20                  Wyoming corporation; Stavatti  
21                  Corporation, a Minnesota corporation;  
22                  Stavatti Immobiliare Ltd, a Wyoming  
23                  corporation; Stavatti Industries, Ltd, a  
24                  Wyoming corporation; Stavatti Niagara,  
25                  Ltd., a New York corporation Stavatti  
26                  Super Fulcrum, Ltd, a Wyoming  
27                  corporation; Stavatti Ukraine, a Ukrainian  
28                  business entity; Stavatti Heavy Industries  
29                  Ltd, a Hawaii corporation; Christopher  
30                  Beskar and Maja Beskar, husband and wife;  
31                  Brian Colvin and Corrina Colvin, husband  
32                  and wife; John Simon and Jean Simon,  
33                  husband and wife; William McEwen and  
34                  Patricia McEwen, husband wife; Rudy  
35                  Chacon and Jane Doe Chacon, husband and  
36                  wife; and Does 1 through 10, inclusive,

37                  **DECLARATION OF VALENTINO  
38                  DIMITROV IN SUPPORT OF  
39                  MOTION FOR SUMMARY  
40                  JUDGMENT**

41                  Defendants.

1 I, Valentino Dimitrov, declare as follows:

2 1. I am over the age of 18 and a resident of Arizona.

3 2. I signed a Promissory Note dated February 27, 2022 to provide a principal  
4 amount of one million dollars to Stavatti Aerospace Ltd. (the "Promissory Note").

5 3. I provided the principal (the "Principal") in the amount of one million  
6 dollars to Stavatti Aerospace, Ltd.

7 4. Prior to signing the Promissory Note, I was never told that Stavatti  
8 Aerospace had never manufactured an aircraft.

9 5. Prior to signing the Promissory Note, I was never told that the repayment of  
10 the Principal was contingent on incoming funding facilitated by DelMorgan & Co., an  
11 investment banking firm.

12 6. Prior to signing the Promissory Note, I was never told that Stavatti  
13 Aerospace was a struggling company. I was not told Stavatti Aerospace had limited funds,  
14 owed multiple debts, and would not be able to repay the terms of the Promissory Note  
15 without the DelMorgan funding.

16 7. Prior to and upon signing of the Promissory Note, I did not agree to an  
17 extension of time for repayment of the Principal in the event DelMorgan would not be  
18 able to facilitate funding for Stavatti Aerospace.

19 8. Stavatti Aerospace has not made a single payment to me for repayment of  
20 the Principal.

21 9. I am still awaiting repayment of the Principal.

22 10. I declare under penalty of perjury that the foregoing is true and correct.

23 **DATED** this 30 th day of July 2025.

24 By:   
25 Valentino Dimitrov



## Audit trail

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